

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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FELISHATAY ALVARADO :  
Plaintiff : Civil Action No. 22-3763  
: :  
v. : :  
: :  
CITY OF PHILADELPHIA, *et al.* : :  

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**ORDER**

AND NOW, on this \_\_\_\_\_ day of \_\_\_\_\_, 2024, upon consideration of Defendants' Motion in Limine to the Testimony and Report of Glenn Garrells, and Plaintiff's response in opposition thereto, it is hereby **ORDERED** that the Defendants' Motion is **DENIED**.

**BY THE COURT:**

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**John F. Murphy, District Judge**

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**PLAINTIFFS' BRIEF IN OPPOSITION TO  
THE DEFENDANTS' MOTION *IN LIMINE* TO THE TESTIMONY AND REPORT OF  
GLENN GARRELLS**

The Defendants filed a completely boilerplate motion *in limine* to exclude Plaintiff's well-qualified liability expert, Glenn Garrells. As shown by his *curriculum vitae*, Mr. Garrells was a Lieutenant with the New Jersey State Police for many years who oversaw countless warrant enforcement actions, and trained countless officers regarding the same. As such, he is well-qualified to testify regarding national standards and standard practices to ensure that a warrant is only enforced at the home described in the warrant issued by the Court. The Defendants make no claim that Mr. Garrells lacks the experience, training, or knowledge claimed in his *curriculum vitae* and report.

**WHEREFORE**, Plaintiff respectfully requests for the Court to **deny** the instant Motion, in the form of the attached proposed Order.

**Respectfully submitted,**

/s/ Keith West  
**Keith West, Esquire**  
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***Attorney for the Plaintiff***

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**CERTIFICATE OF SERVICE**

I, Keith West, Esquire, on this date, by electronic filing, caused a true and correct copy of Plaintiff's above Brief to be served on the Defendants.

Jonah Santiago-Pagan, Esquire  
Emily Hoff, Esquire  
1515 Arch Street, 14th Floor  
Philadelphia, PA 19102  
***Attorney for Defendants***

**Respectfully submitted,**

/s/ Keith West  
Keith West, Esquire  
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